

**IN THE UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION**

RICHARD SMITH , on behalf of himself and all others similarly situated, Plaintiff, v. KAYE-SMITH ENTERPRISES, INC. , Defendant.	Case No.: 3:22-CV-01499-AR JOINT NOTICE OF REVISED SETTLEMENT
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The parties file his notice to advise the Court that all parties to this action, including Plaintiffs Richard Smith, Noel Woodard, Richard Krefting, and Defendant Kaye-Smith have reached a revised agreement to settle all claims in this matter. The parties have provided a copy of the revised agreement to class member Boeing Employees' Credit Union ("BECU"), who has indicated a desire to suggest minor changes to which the parties are agreeable in principle. The parties are finalizing the details of this agreement with input from BECU and intend to file a revised agreement for which they will seek preliminary approval from the Court in short order. Therefore, the parties ask that the Court not issue a ruling based on the motion that it has taken under advisement as of January 26, 2024 [ECF no. 79], until the parties have submitted the revised agreement for the Court's approval.

Dated this 5th day of February, 2024.

BAXTER & BAXTER, LLP
RHODES LEGAL GROUP
HEENAN & COOK, PLLC

/s/ John Heenan
John Heenan (Pro Hac Vice)
Attorneys for Plaintiff and Interim Class Counsel